

The ISO received comments on the topics discussed at the June 13, 2022 stakeholder call from the following:

1. Public Advocates Office at the California Public Utilities Commission (Cal Advocates)

Copies of the comments submitted are located on the 2021-2022 Transmission Planning Process page at:

<https://www.caiso.com/planning/Pages/InterregionalTransmissionCoordination/default.aspx>

The following are the ISO's responses to the comments.

1. Public Advocates Office at the California Public Utilities Commission (Cal Advocates)		
Submitted by:		
No	Comment Submitted	CAISO Response
1a	<p>At the June 13, 2022 presentation, CAISO stated that because the SWIP-North Project is entirely within NorthernGrid's system, it is not a Federal Energy Regulatory Commission (FERC) Order 1000 ITP. The SWIP-North ITP Evaluation Process Plan – posted on both the WestConnect and NorthernGrid websites – states that SWIP-North has sought cost allocation from NorthernGrid. SWIP-North has also applied to the CAISO for approval (and cost allocation) as an economic project.</p> <p>If NorthernGrid and the CAISO both find that they need SWIP-North, would NorthernGrid and the CAISO be able to apply the Order 1000 cost allocation process for interregional transmission projects to SWIP-North?</p>	<p>The Order 1000 interregional cost allocation process is not applicable to the SWIP-North project. If NorthernGrid and the CAISO each determine there is a Regional need for this project, the entities within NorthernGrid that benefit from the project and the CAISO can discuss cost allocation.</p>
1b	<p>At the June 13, 2022 presentation, WestConnect described its evaluation plan for the North Gila – Imperial Valley #2 Project (NGIV2). WestConnect also stated that 1) it has never identified a regional need that has led to the consideration of an ITP, and 2) NGIV2 did not request cost allocation from WestConnect. The Imperial Irrigation District in California could share costs with the CAISO; however, the Imperial Irrigation District is not a WestConnect member.</p> <p>Please explain the possible cost allocation outcomes, if any, of WestConnect's evaluation of NGIV2. If cost allocation of NGIV2 to beneficiaries in Arizona is not considered, what is WestConnect's purpose in evaluating NGIV2?</p>	<p>Imperial Irrigation District <u>is</u> a member of WestConnect. If WestConnect identifies a regional need during the 2022-23 Regional Planning Process and NGIV2 submits its project as a proposed alternative to meet the identified regional need, WestConnect will evaluate the project to determine if NGIV2 is a more efficient or cost effective solution to the identified regional need. NGIV2 did not request regional cost allocation from WestConnect in its Interregional Transmission Project submittal to WestConnect, and as such, WestConnect would not further evaluate NGIV2 for cost allocation.</p>